

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA :
Plaintiff, :
vs. :
CURTIS JONES, et al. :
Defendants. :

CASE NO. 00-6293-CR-FERGUSON

FILED BY
2001 JAN 25 PM 12:41
CLERK U.S. DISTRICT
C.T.
S.D. OF FLA-FTL

EX PARTE MOTION FOR INVESTIGATIVE FEES IN EXCESS OF \$300.00

Defendant Curtis Jones, by and through undersigned counsel, respectfully requests this Court to grant investigative cost and in support thereof says:

Defendant and co-defendants are in the process of evaluating State court records for Dade, Broward and Palm Beach Counties on the issue of selective prosecution. The collection of this data is time consuming and each defendant is seeking to spread the cost of this data collection among the other defendants'. To date the Federal Defender has done the bulk of the work but they need support from the co-defendant's that have been appointed as CJA counsel. Paul Smerechniak has been contacted by counsel for Alexis Clemente, Howard Greitzer, Esquire to collect this data from the various clerk's offices.

Therefore counsel for this defendant is seeking authorization

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for \$1000.00 in investigative funds to hire the same investigator to promote a more efficient and cost effective use of labor in collecting this data.

Undersigned counsel has discussed this with Investigator Paul Smerechniak of Liberty Investigative Services 2701 North Ocean Blvd., Suite 16D, Ft. Lauderdale, FL. 33308, and he has agreed to provide these services.

WHEREFORE the Defendant request that this Court grant the following:

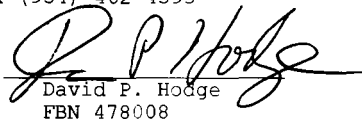
That funds be approved and that this Honorable Court authorize fees in the amount of \$1,000.00 for investigative services.

Date: January 25, 2001

Respectfully submitted,

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BY:


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